

EXHIBIT 17

DECLARATION OF DOROTA GREJNER-BRZEZINSKA

I, Dorota A. Grejner-Brzezinska, declare pursuant to 28 U.S.C. 1746 and under the penalty of perjury, that the following is true and correct.

1. I am the Vice Chancellor for Research at the University of Wisconsin-Madison (“UW-Madison”), a position I have held since 2024. In this role, I have responsibility for overseeing the university’s research enterprise with more than \$1.7 billion in annual research expenditures. My office also includes administration of 20 cross-campus research and service centers. The mission of the Office of the Vice Chancellor for Research is to advance excellence in research and scholarship, to support our multidisciplinary research centers and institutes, and to provide campus-wide administrative infrastructure to support and advance the research enterprise. Prior to holding this position, I was the Vice President of the Office of Knowledge Enterprise, Associate Dean for Research in the College of Engineering, and a Professor of Civil, Environmental and Geodetic Engineering at The Ohio State University. At Ohio State, I also served as senior vice president for corporate and government partnerships, focusing on growing research talent and helping launch new research institutes and centers. I have mentored 16 doctoral students and secured nearly \$39 million in research funding for my own research, which is centered on GPS, the Global Positioning System. My laboratory developed the first fully digital and directly geo-referenced Airborne Integrated Mapping System, combining high-resolution digital, aerial camera images with GPS and inertial technology. I have served on the President’s Council of Advisors on Science and Technology (2019-2021) and was appointed to the National Science Board in 2023. I am also a fellow of the American Association for the Advancement of Science, the Institute of Navigation, and the Royal Institute of Navigation and member of the

National Academy of Engineering. Additionally, I serve as principal investigator of the National Science Foundation's Engineering Research Visioning Alliance.

2. As the Vice Chancellor for Research, I have personal knowledge of the matters set forth below or have knowledge of the matters based on my review of information and records gathered by university staff and could testify thereto.

3. As Wisconsin's flagship research university, UW-Madison receives a substantial amount of research support from the U.S. Department of Energy ("DOE") each year. DOE-funded research at UW-Madison fuels innovation in areas critical to the nation's future, including energy technologies, nuclear engineering, fusion energy, grid resilience, energy storage, and advanced computing for energy systems. This work also supports the training and development of the next generation of scientists and engineers addressing the country's most pressing energy challenges. As of April 2025, UW-Madison holds 493 active DOE-funded awards (both direct and pass-through), with a total budgeted value of \$537.7 million, inclusive of both direct and indirect costs. According to the university's recently published Data Digest (p. 67), \$81.9 million in new DOE funding was awarded in FY 2024–25 to support ongoing projects—contributing significantly to the advancement of research and the infrastructure needed to sustain it.

4. The funding UW-Madison receives from DOE supports critical and cutting-edge energy research, which millions of Americans benefit from and depend on. For example:

- a. **Great Lakes Bioenergy Research Center (GLBRC).** The almost 350 scientists and staff of the GLBRC are charting a path for the United States to be a world innovation leader in producing fuels, chemicals, and materials from crops grown on acres that are not suitable for food production. Federal F&A costs are critical to generate cost-competitive products from plants and

microbes adapted for this purpose. These funds are essential to secure the laboratory, field and computational data that will ensure the US position as a leader in producing fuels, chemicals and materials from abundant home-grown agricultural residues. The research breakthroughs enabled by F&A investment will provide economic benefits to farmers, create jobs for rural communities, ensure international leadership in the increasingly competitive field of plant and microbial biotechnology, and provide a trained workforce to support a secure and resilient US bioeconomy.

- b. **UW-Madison School of Medicine and Public Health Cyclotron Laboratory.** UW-Madison's School of Medicine and Public Health Cyclotron Laboratory is one of six University members of the DOE Office of Science's [University Isotope Network](#), a collection of accelerator and radiochemistry facilities who work together with the DOE and National Laboratories to provide needed radioactive feedstock materials and expertise to U.S. and international industry, medical centers, and researchers. Unplanned reductions in funding for this work will imperil medical research and industrial partnerships that are the result of years or decades of successful efforts, including those building to clinical trials of novel radioactive cancer drugs. The Cyclotron Laboratory collaborates widely on projects supported by DOE R&D funding, including (1) with the UW Department of Chemistry and Oak Ridge National Laboratory, developing novel radioactive drugs to diagnose and treat cancer and the technology to produced them cost efficiently at scales that facilitate widespread distribution, and (2) with the UW College of Engineering, with whom they are

working in collaboration with TerraPower to develop and test new cladding materials for molten salt nuclear reactors that can power U.S. energy independence for the coming generation of high demand artificial intelligence and machine learning applications.

- c. **Renewable Energy Planning and Community Engagement.** In 2024, UW–Madison Extension received a \$1 million DOE grant through the Renewable Energy Siting through Technical Engagement and Planning (R-STEP) program. This funding supports the Renewable Energy Siting and Engagement for Tomorrow (RESET) project, which aims to assist Wisconsin communities in planning and permitting large-scale solar and wind projects. The initiative emphasizes inclusive engagement, particularly with rural and tribal communities, to ensure equitable benefits from renewable energy development.
- d. **Smart Grid Deployment in Rural Communities.** UW–Madison's College of Engineering is collaborating on the Smart Power Automation in Rural Communities (SPARC) project, backed by up to \$50 million from DOE. This initiative focuses on enhancing energy access and grid resilience in 27 disadvantaged and two tribal communities across Wisconsin. The project includes upgrading grid infrastructure, integrating renewable energy sources, and providing workforce training to prepare local workers for smart grid jobs.
- e. **Sustainable Bioenergy and Fertilizer Reduction.** In early 2025, a UW–Madison-led research team secured \$5.5 million from DOE to explore methods for reducing synthetic nitrogen fertilizer use in bioenergy crops. The

project investigates leveraging plant-microbe interactions to enhance nitrogen fixation, aiming to improve sustainability and reduce environmental impacts in bioenergy production.

f. Nuclear Energy Research and Innovation. DOE awarded \$4.6 million to UW–Madison engineers for multiple nuclear energy research projects. These include studies on advanced reactor materials, cybersecurity for microreactors, and systems integrating nuclear energy with desalination and mineral extraction processes. The funding also supports early-career researchers contributing to the future of nuclear technology.

g. Concentrated Solar Power Systems. UW–Madison researchers received approximately \$1.9 million from DOE’s SunShot Initiative to develop a fixed-bed regenerator system compatible with supercritical carbon dioxide cycles. This technology aims to improve the efficiency and cost-effectiveness of converting solar thermal energy into electricity.

5. Indirect costs are essential for supporting this research. The DOE’s proposal to cut indirect cost rates to 15% would end or seriously jeopardize all of the research projects described in paragraph 4.

6. Indirect costs include the construction and maintenance of state-of-the-art research facilities—such as laboratories, core facilities, and data centers—as well as the procurement and upkeep of the infrastructure needed to support research activities. This includes utilities, HVAC systems, high-speed data networks, secure data storage, and shared administrative services that ensure compliance, safety, and operational continuity. They also support decades long field studies of crops to be used for bioenergy production, maintaining security of imaging, analytical,

fermentation and reactor datasets needed to train AI models. Without these foundational investments, the research itself cannot take place.

7. For example, with respect to the areas of research described in Paragraph 4:

- a. Research in the GLBRC depends on a suite of interconnected field, laboratory, and computational capabilities. This includes agricultural equipment to plant crops, drones to monitor crop productivity, remote sensors to assess the impact of moisture and soil geochemistry on crops, crop harvesting equipment, and specialized equipment to process harvested crops. In addition to typical laboratory equipment, there is routine use of genomic equipment, high throughput robotic platforms, high accuracy and sensitivity NMR imaging, microscopy, chromatography, and mass spectrometry equipment, as well as specialized facilities for biomass deconstruction, fermentation, and downstream product purification. Data from this equipment is captured by a specialized and secure Laboratory Information Management System, so it is available for immediate use by relevant investigators, to provide training sets for AI/ML models at campus, and to be linked via DOE data systems for analysis at off campus high performance computing sites.
- b. University Isotope Network indirect funding supports continued maintenance and readiness of the University of Wisconsin's Cyclotron Laboratory and its associated radiochemistry infrastructure, which include a network of hot cells and automatic radiochemistry synthesizer robots, high performance germanium gamma ray and X-ray spectrometers, inductively coupled optical emissions spectrometers, high performance liquid chromatographic systems, and

autoradiography phosphor imaging systems that ensure radioactive material is accurately characterized and quantified before being used in human patient studies or shipped to over 100 different industrial, pharmaceutical, hospital, biotech, and academic users in the U.S.

8. Physical space costs are one of the largest components of indirect costs, and the amount of space available to researchers has a direct and obvious impact on the amount of research that can be done at UW-Madison. Reduced continuity in operational funding, which comes to the Cyclotron Laboratory only from the DOE Office of Science, threatens plans for a needed expansion of the current laboratory, whose construction is scheduled to begin in less than two years. This is a NIH and UW-funded effort that will enable the Midwest to produce a suite of cutting-edge radioactive materials that are being contemplated at only a few other locations in the world.

9. In addition, indirect costs fund the administration of awards, including staff who ensure compliance with a vast number of regulatory mandates from agencies such as DOE. These mandates serve many important functions, including ensuring research integrity; properly managing and disposing of chemical and biological agents used in research; preventing financial conflicts of interest; managing funds; preventing intellectual property, technologies, or national security expertise from being inappropriately accessed by foreign adversaries; and providing the high level of cybersecurity, data storage, and computing environments mandated for regulated data.

10. Recovery of UW-Madison's indirect costs is based on predetermined rates that have been contractually negotiated with the federal government.

11. UW-Madison has a Negotiated Indirect Cost Rate Agreement (“NICRA”) with DHHS, covering all federal agencies, and effective as of January 17, 2025. The indirect cost rate in UW-Madison’s NICRA is 55.5%. This rate is composed of 26% for administrative costs and 29.5% for facility costs. Administrative costs are the general costs to administer research, such as accounting, payroll, and research oversight and are capped by federal law at 26%. Facility costs include the maintenance and depreciation of the research facilities.

12. An F&A rate reduced to 15% would eliminate approximately \$14 million in annual funding and result in a similar future reduction in resources available to support research. UW-Madison depends on this funding to sustain its research programs and the infrastructure that supports them. The loss of these funds would immediately impact the university’s ability to cover critical expenses associated with its energy research enterprise. This includes costs related to maintaining compliance with federal regulations designed to safeguard national energy security, protect intellectual property, and ensure the responsible conduct of research in areas such as nuclear energy, grid modernization, clean energy technologies, and high-performance computing. It would also compromise the university’s ability to maintain the specialized facilities, safety protocols, and administrative oversight necessary for conducting advanced research involving hazardous materials, high-voltage systems, and sensitive technologies essential to U.S. energy leadership and innovation.

13. This reduction will have deeply damaging effects on UW-Madison’s ability to conduct research from day one. For example:

- a. Reductions in indirect costs to the Cyclotron Laboratory risk the support necessary to maintain one of the most qualified accelerator operations staffs in the world, which is comprised of accelerator physicists, radiochemists,

nuclear engineers, and nuclear chemists. Four staff scientists in the Cyclotron Group are partially supported by DOE funds, and without this support it is likely that funding would drop below the level needed to maintain at least two of these positions by Spring of 2026.

b. Loss of F&A could hinder the ability of the GLBRC to conduct the needed number of field trials of next generation bioenergy crop performance in accordance with federal and local guidelines.

14. UW-Madison has for decades relied on the payment of indirect costs. And until now, we have been able to rely on the well-established process for negotiating indirect cost rates with the government to inform our budgeting and planning. Operating budgets rely on an estimate of both direct and indirect sponsored funding to plan for annual staffing needs (*e.g.*, post-docs, PhD students, and other research staff), infrastructure support (*e.g.*, IT networks, regulatory compliance, and grant management support), and facility and equipment purchases. And in some cases, UW-Madison has long-term obligations—for example, and it relies on budgeted grant funding, including associated indirect cost recovery, to fulfill these commitments.

15. Disruptions to UW-Madison's research will also have negative effects in the Madison area, the state of Wisconsin, and the broader region. UW-Madison's research fuels spending in the regional economy including by driving discoveries that launch new ventures, attract private investment, and make a positive social impact. For example, as recently reported by Northstar Analytics, LLC, UW-Madison affiliated organizations and startups collectively contribute \$30.8B per year to the Wisconsin economy, this economic activity supports more than 232,000 jobs and generates \$1 billion in state and local taxes. A massive reduction in UW-

Madison's research budget would immediately and seriously jeopardize these contributions to the local region.

16. Finally, slowdowns or halts in research by UW-Madison and other American universities will allow competitor nations that are maintaining their investments in research to surpass the United States on this front, threatening both our Nation's national security and its economic dominance. The National Biotechnology Initiative Act of 2025 released by the National Security Commission on Emerging Technology on April 11 2025 calls for multibillion-dollar biotech funding boost. The report points to two objectives: "make America innovate faster, and slow China down," and proposes two "grand research challenges," one focused on "making biotechnology predictably engineerable," and the other focused on "making biomanufacturing scale-up predictable, rapid, and cost-competitive." DOE-funded research performed in units across UW Madison, and the GLBRC in particular, responds directly to these challenges by developing innovative new bio-based technologies to produce chemicals, fuels and materials that meet the needs of society. Reducing F&A of innovative biotechnology research will harm the goals of this federal initiative and delay research that is crucial to national security.

17. Nor can UW-Madison cover the funding gap itself. While UW-Madison maintains an endowment, through the Wisconsin Foundation and Alumni Association (WFAA) and the State of Wisconsin Investment Board (SWIB), it is neither feasible nor sustainable for UW-Madison to use endowment funds or other revenue sources to offset shortfalls in indirect cost recovery, for several reasons:

- a. The majority of UW-Madison's endowment—over 80%—is restricted to specific donor-designated purposes, such as scholarships, faculty chairs, and

academic programs. UW-Madison is not legally permitted to use those funds to cover research infrastructure costs.

- b. Even the small portion of the endowment that is unrestricted is subject to a carefully managed annual payout, typically around 4.5%, to ensure long-term financial stability for the institution.
 - c. As a non-profit institution, UW-Madison reinvests nearly all of its revenue into mission-critical activities, leaving little margin to absorb unexpected funding gaps. Given the importance of research to its institutional mission, the University will provide limited bridge funding to grants on a temporary basis. Providing support beyond that is not possible because, unlike for-profit organizations, UW-Madison does not generate significant surpluses that could be redirected without impacting core academic priorities such as educational programs and financial aid support for students.
18. Moreover, absorbing the cost of a lower indirect cost rate, even if it were possible, would create long-term budget pressures on UW-Madison - which would in turn force reductions in key investments supporting UW-Madison's faculty, students, staff, research, and teaching infrastructure, as well as other critical activities needed to maintain UW-Madison's academic excellence.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 13, 2025.



Dorota A. Grejner-Brzezinska

